

REMARKS

Receipt of the office action mailed January 17, 2007 is acknowledged. The drawings and claims 1 and 9 are objected to. Claims 1-16 are rejected under Section 112(2). Claims 1-7 are rejected as anticipated by Evans, claim 8 is rejected as obvious over Evans, claims 9-16 are rejected as obvious over Martus in view of Boyle, and claims 18-23 are rejected as obvious over Stitt in view of Boyle and Staubli. In keeping with the foregoing amendment and the following argument, reconsideration and allowance are respectfully requested.

In response to the Section 112 rejection, applicant has replaced claim 1 with claim 24. The new claim has been written to overcome the Section 112 issue. Applicant has also clarified claim 9 to recite a non-threaded surface instead of smooth. Even if the item of claim 9 deforms, it does not form threads. The amendment to claim 9 and new claim 24 also address the objection to the drawings. Accordingly, the Section 112 rejections are overcome.

Claim 24 positively recites, in part, a valve stem extension attachable to the valve stem and having a tip and a set of male threads, and an internally threaded female aperture formed in the actuator rod. A generally cylindrical body includes a non-threaded outer side surface sized for insertion into the female aperture, with the first axial end facing out of the aperture and the second axial end facing into the aperture. A wedge is formed adjacent the first axial end of the body, with the wedge including an inner engagement surface sized to surround and engage the tip of the valve stem extension when the valve stem extension is threaded into the aperture after insertion of the body. The wedge further includes a non-threaded outer engagement surface positioned adjacent the threads of the female aperture, and the wedge is sufficiently pliant to deflect radially outward in response to threading the valve stem extension into the female aperture.

By comparison, the body 1 of Evans is threaded, as opposed to non-threaded as claimed. Further, the slightly conically shaped tip 2 of the body 1 is on the end disposed deepest into the aperture and faces into the aperture, whereas the presently claimed wedge is on the end of the body disposed toward the opening and faces out of the aperture. Finally, the end of the body 1 that faces out of the aperture is flat, and simply cannot be considered as a wedge. Accordingly, for all the foregoing reasons, Evans cannot possibly anticipate claim 24. Accordingly, claim 24 is in allowable form.

Moreover, there can be no proper *prima facie* case of obviousness based even in part on Evans, as there would be no suggestion to flip the body 1 of Evans over. Making such a change would present a blocked face to the tool 10 that is designed for insertion into the open end of the body 1. This would render fully half of the disclosure of Evans useless, thus destroying the express teachings of the reference (if not the functionality as well), and would entirely change the principle of operation. Accordingly, Evans cannot render claim 24 obvious, either alone or in any proper combination.

Boyle adds nothing. On Stitt, both of the components disposed inside the internal bore are threaded. Removing the threads from either would render the device non-functional, and would involve the use of hindsight. The set screw on the Martus reference has a threaded outer surface, and eliminating the threads would render the headless set screw of the reference entirely inoperable, making it impossible for the set screw to stay put inside the threaded aperture. Further, on Martus the end 13 does not face outwardly. Every embodiment of Staubli appears to have a threaded outer surface on the body that deforms outward, and a smooth non-threaded surface on the body that is forced into the opening to deform the outer body. Such an arrangement is very different from claim 24, and there can

be no way to modify that reference without entirely discarding the very particular teachings of that reference.

Claims 2 through 8 have been amended to depend from claim 24. Accordingly, those claims also are in allowable form.

Claim 9, which has been amended as outlined above, positively recites, in part, a first connection member defining an insertion end formed with male threads, a second connection member defining an aperture formed with female threads complementary to the male threads, and a body having a non-threaded outer surface. A continuous wedge projecting from the first axial end of the body,

Martus discloses a threaded bore, and two (2) threaded bodies disposed in the threaded bore. See lines 53-57 of Martus. The reference describes both bodies as “set screws.” Each set screw of Martus must have a slot. Claim 9 recites a continuous wedge. One cannot modify Martus to have a continuous wedge without eliminating the slot. It makes no difference whether the action proposes to combine Martus with Boyle or any other reference, a proper *prima facie* case of obviousness cannot destroy the express teachings of the reference.

There is no escaping the fact that Martus has a slot 12 to receive the tool of Fig. 8, and that that the needed modification eliminates the slot, and renders the tool useless. The whole point of the Martus device is to provide a “headless set screw.” This function is achieved by providing the specially designed tool that fits into the specially designed slot. Eliminating the slot, and rendering the tool useless, is a textbook case of destroying the express teachings of a reference. No proper *prima facie* case of obviousness can be based on these circumstances. Accordingly, the rejection is overcome and claim 9 is in allowable form.

All claims dependent upon claim 9 also are in allowable form.

Claim 23 has been amended to positively recite, in part, that the wedge has a generally conical inner engagement surface, with the inner engagement surface disposed inside the wedge and adapted to engage the tip of the extension stem. The wedge includes a non-threaded outer engagement surface adapted to engage the threaded aperture of the valve actuator rod.

Whatever Stitt discloses, it is apparent that the area 8 – even if we call it a wedge for this argument - does not contact the threads of the surrounding threaded aperture. Instead, this area contacts the area 12 on the other threaded body. Moreover, the area 8 is an outer surface, as opposed to an inner engagement surface disposed inside the wedge as presently claimed. The reference has two threaded bodies. Further, there can be no proper suggestion to modify Stitt to reach the invention of claim 23, because any such modifications would completely destroy the very particular teachings of the reference regarding how the two threaded bodies interact and engage one another.

Boyle adds nothing, except a smooth rod in a smooth bore, with the smooth rod being free to slide as guided by the tab 60 in the slot 62.

Staubli likewise adds nothing. Staubli uses a threaded outer surface on the body that deforms outward, and a smooth non-threaded surface on the body that is forced into the opening to deform the outer body. Again, this is very different from the limitations of claim 23, and there can be no way to modify that reference without entirely discarding the very particular teachings of that reference. Accordingly, claim 23 is in allowable form, as are all claims that depend from claim 23.

In view of the above discussion, applicant submits that each of the presently pending claims is in immediate condition for allowance. Accordingly, the examiner is respectfully requested to pass this application to issue. It is believed that no fees are necessary in

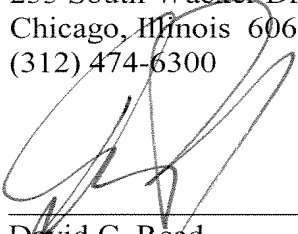
connection with the present Amendment. However, in the event that any fees are due, kindly charge the cost thereof to our Deposit Account No. 13-2855.

Respectfully submitted,

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